

Honorable Judge Richard A. Jones

UNITED STATES DISTRICT COURT

for the WESTERN DISTRICT of WASHINGTON

Ashley M. Gjovik (pro se),

Plaintiff(s),

v.

State of Washington, et al.

Defendant(s).

CASE NO. 2:22-cv-00807-RAJ-BAT

APPENDIX WITH EXHIBITS

FOR EMERGENCY MOTION FOR
INJUNCTIVE RELIEF

APPENDIX WITH EXHIBITS

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EXHIBIT A

EXHIBIT A: Examples of References to Gov Charges in Petition & Testimony

Note: see full Petition & Order for Restraining Order in Complaint Appendix, Exhibit B, pg4

1. Petition for Restraining Order (see, Complaint, Exhibit B)

Pg3, written by Petitioner (content disputed by Gjovik in state Reply & Motions)

Out of desperation, I connected with a mutual friend, Melissa McEwen, to try to get her to stop. She told this mutual friend she was doing it because I am cited in Apple, Inc's defense against her in one of her NLRB and DOL cases against the company. She told the mutual friend she would only stop engaging in the behavior if I promoted her Twitter account (~8,000 followers) on my own Twitter account (~55,000), and promoted her GoFundMe (goal of \$100,000 for misc purposes). I refused to oblige, and sent a report to the FBI, suspecting that this was extortion

Pt for an Or for Protection – Harassment/Stalking (PTORAH, PTORSTK) – Page 3 of 7
WPF UHST-02.0200 (07/2019) – RCW 10.14.040, .800, RCW 7.92.030
KCDC July 2019

Pg4, written by Petitioner (content disputed by Gjovik in state Reply & Motions, & now in federal cases)

How did the respondent make these statements? ☐ in person ☐ mail/written notes
☐ e-mail ☐ text ☐ phone ☒ social media (such as Facebook and Twitter)
☐ other (describe): _____

B. Describe other incidents of harassment or stalking. For each incident, include the date, time (on or about), location, what was said, how statements were made, and what was done to a victim.

because of the monetary value associated with her demands in exchange to stop harassing me. Another friend, Janneke Parrish, also tried to get her to stop, she said she made similar possibly extorting requests to stop.

I also reported her behavior to her University, and to Twitter. Neither of these seems to have deterred her from continuing to engage in the harassment.

On January 11, 2022, she filed an NLRB charge against Apple, Inc, claiming that I was harassing her on Apple's behalf. I have not harassed her. On January 31, 2022, she published a "memo" for that charge containing defamatory and private information about me (and others) on a platform called Scribd. Ordinarily, this information would be redacted and confidential by the NLRB. She has shopped this information around to the press in an attempt to make it public record, for malicious purposes. Much of the information she has reposted is my personal medical information, which I have not given her consent to share.

<https://www.scribd.com/document/555822358/US-NLRB-Ashley-Gjovik-Apple-Inc-Jan-10-2022-Charge-Draft-1>

https://twitter.com/ashleygjovik/v/with_replies (there's a lot more here)

Pg 6, written by Petitioner, (content disputed by Gjovik

12. Is there any other litigation between the victim/s and the respondent? This includes all matters - pending or past - such as parenting plans, landlord-tenant disputes, employment disputes, or property disputes. If yes, provide case number/s if known, type of case, and name of court:

NLRB Charge CA-288816 - charge against Apple, Inc, which contains false/misleading information about me made in bad faith by Ashley Gjovik

> Requests

2. TRO Denial (see, Complaint, Exhibit C, pg5)

Written by Judge O'Toole

☐ The harassment protection order **petition does not list specific incidents and approximate dates of harassment.**

☒ **The reasons for denial of the order are:**

Respondent lives in California. There is no emergency/irreparable harm if emergency order not issued. Many of the complained-of actions serve a lawful purpose (filing with NLRB) and involve free speech. However, other allegations may have merit, thus this Court will set a full-order hearing.

☒ **A preponderance of the evidence has not established that there has been harassment.**

☐ **Other:**

3. Grant of Restraining Order (see, Complaint, Exhibit C, pg13)

Written by Judge O'Toole:

☒ **Other:**

Respondent shall not make any statements or posts or other publications about Petitioner, including, but not limited to, petitioner's medical information, petitioner's family, petitioner's names, on any social media or internet or other medium. Nothing about this Order prohibits Respondent from testifying in administrative or judicial proceedings.

4. Petitioner's Written Statement, Submitted Feb 15 2022 & Incorporated March 1 2022

Note: full statement is 7 pages, single spaced.

Scarlett v. Gjovik
King County Court
2/15/2022

22CIV01704K

FILED

FEB 15 2022

KCDC-East Division
Redmond Courthouse

Statement by Cher Swan Scarlett

Your honor:

I am speaking for myself today as I do not have the financial means to afford an attorney. Please understand I lack experience in legal proceedings, and I have struggled with advocating for myself in the past, often being victimized by bullies and doing nothing. As Ms. Gjovik said when she reached out to me, I have a lot of courage in speaking up for others. I have not done well in standing up for myself in the past.

///

We started a movement called #AppleToo together, but after she made other members of the group uncomfortable with her punching down on collective action, defensive aggression after constructive feedback about a racist Twitter post she made, and her wishes to use the movement as private leverage for her own cases against Apple, she voluntarily parted ways

///

In late August of 2021, Ms. Gjovik shared with me that she had leaked information protected by our non-disclosure agreements to Zoe Schiffer of the Verge, and she was terminated a week later for those policy violations. Ms. Gjovik was later denied unemployment benefits by the state of California after they determined she was terminated for just cause, per her sharing the letter from unemployment on Twitter. I shared an opinion on the application Blind that it would be difficult to prove her retaliatory discharge claims to the NLRB and the Department of Labor because she had, in fact, leaked those documents. In December of 2021, she initiated a

///

1 The only contact after that, was an email I sent her on February 5th, 2022, when I asked Ms.
2 Gjovik to stop cyberharassing me, cyberstalking me and my family, and to delete and/or redact
3 private or personal information about myself and my family (which included medical information
4 about me, my minor daughter's my mother's and my husband's names, and my husband's old
5 criminal history), defamatory assertions, and my social media posts and authored articles that
6 could not be reasonably considered to be connected to her and her allegations against Apple. I
7 informed her that her continued posts about my family were causing them to also be
8 cyberharassed, and that CPS was receiving false reports about the safety and wellbeing of my
9 child.

10 Ms. Gjovik not only misrepresented this email, but escalated in her defamation, claiming I was
11 not only harassing and defaming her, but that I was making false calls to authorities or
12 emergency services to have armed officers dispatched to her home (she referred to this as
13 "SWATing"), stalking her, threatening her, suing her, coercing her, demanding that she destroy
14 evidence, colluding with Apple to obstruct justice, and that I am under investigation by the
15 federal government for obstruction of justice and witness intimidation. None of these things are
16 true.

17 ///

18 Ms. Gjovik stated she was cyberharassing me because I was testifying against her on behalf of
19 Apple in her cases against them, and further because I reported her conduct to the FBI. This is
20 untrue, as Alexander Hajduk, an investigating officer of the NLRB, and I both told her. I was
21 cited in their defense with a text message conversation she posted on Twitter, not testifying
22 against her.

23 ////

24 The Director of Security of the NLRB, Raymond Hankins, and the supervisory Field Attorney for
Region 32, Catherine Ventola, which is handling Ms. Gjovik's NLRB charge which names me,
both recommended over the phone that I report Ms. Gjovik's conduct to federal and local
authorities, on or around January 25, 2022, and on or around February 4, 2022, respectively.
They further advised that they had had numerous operations meetings to discuss how to handle
Ms. Gjovik's conduct and my personal and private information being published without my or my
family's consent. They advised they would redact information per Exemption 6 of FOIA, and
linked me to the relevant guide from the DOJ, but said they did not have jurisdiction over her

posting that information elsewhere, and again advised that I seek remedy through those with the jurisdiction to take action, and that they could not get involved aside from redacting information in the charges.

Ms. Gjovik has taken it upon herself to publish information in documents related to her charges that would be redacted per the DOJ's guidelines. I reported this to Twitter, to Scribd, and to her web host, register.com. Scribd removed the posts for abuse, and Ms. Gjovik reuploaded it, and Scribd removed them again. Ms. Gjovik then uploaded it to her personal website, and the host is considering whether or not it breaks their rules against abuse of their services.

Ms. Gjovik deleted most of the private information from Twitter on February 5th, 2022, after I tweeted that I had testified for SB 5628, the anti-cyberharassment bill that passed through the Senate chambers unanimously, and would be moving forward with hiring a process server for this anti-harassment hearing because of Ashley's public response and misrepresentations of my plea for her to stop cyberharassing me. However, she did not redact any information in her memo, which is now hosted on her website and posted numerous times to her Twitter, and added additional private information and defamatory statements.

////

Ms. Gjovik's cyberharassment of me appears to be in part for exercising my own first amendment rights in expressing my opinion that her retaliatory discharge case would be hard to prove because of the bonafide fact that she had leaked private documents about unreleased intellectual property owned by Apple to the press, and additionally because I was cited in Apple's defense case in her charges against the company. I took the time to apologize for exercising those first amendment rights, because it clearly hurt her feelings, despite my right to say such things, and her public assertions that she supported such rights.

////

seeks to do me harm emotionally and to make the general public believe damaging lies with her actions, and it is escalating. She is attempting to abuse government processes to attempt to do me further harm.

If this is not criminal cyberharassment, blackmail and/or extortion, and retaliation for reporting such things, then I do not know what is. And if this type of speech is protected, who then becomes responsible for the damage that this woman, and others, cause, for their own selfish, malicious purposes?

Ms. Gjovik has one goal: to destroy me publicly. No one deserves this.

I have nowhere else to turn.

Please help me find relief from the fear of my well-being, and the safety of myself, my child, and the rest of my family.

1 *Attached to Statement*

2
3 SB 5628 testimony

4 Chair and committee members -

5
6 ////

7 My last recourse has been to seek an anti-harassment order, and all I keep hearing is that people
8 have 1st amendment rights, and that the only reason I was given a hearing is because of the
9 private information she's posted.

10 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,
11 King County District Court, case no. 22CIV01704KCX (1 March2022).

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18 **EXHIBIT B**
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EXHIBIT B: Transcript Excerpts from March 1 Hearing

35

1 1 communications with Kate as -- in your witness statements.

2 2 I actually have those conversations that are being

3 3 referenced. I'm wondering if you would like to hear them?

4 4 MR. BLAIR: Is there a question, Your Honor?

5 5 THE COURT: Yeah, basically right now we're supposed to be

6 6 asking your questions that you have specifically for

7 7 Ms. Gjovik.

8 8 Q. (By Ms. Scarlett) Okay. I guess I'd like to know what

9 9 conversations did I have with Kate that you viewed were

10 10 abusive? Do you have any particular comments?

11 11 A. I don't believe I ever made that allegation.

12 12 Q. Okay. I'm curious then what her testimony has to do with

13 13 your harassment of me?

14 14 MR. BLAIR: Is there a question, Your Honor?

15 15 THE COURT: Yes, she asked a -- you can repeat your

16 16 question.

17 17 Q. (By Ms. Scarlett) My question is: I'm wondering what Kate

18 18 Rotondo's testimony has to do with your harassment of me?

19 19 A. Kate's testimony -- and I don't want to speak on Kate's

20 20 behalf, she wrote a very thoughtful witness statement that

21 21 she should take at her face value. But she was trying to

22 22 point out a pattern and practice of not just you harassing

23 23 us, but as soon as we tried to stand up for ourselves, you

24 24 began attacking us and saying we were harassing you and

25 25 trying to cut off communications so we could no longer even

March 1 2022 Transcript: Page 35

36

1 defend ourselves against your harassment, I believe was the
2 point. And that seems very relevant to this.

3 Your Honor, as my filings included, the judge directions
4 for domestic violence retaliatory litigation, which is what
5 this very much feels like. If not retaliation for the
6 federal charges, it seems like this is the retaliation for
7 me, asking, pleading for Ms. Scarlett to stop harassing me,
8 which she had been since September and instead she switched
9 the offender and victim.

10 Q. So I wrote you one single email in which I apologized for
11 the two things that I said in one single post. How does
12 that -- you haven't presented anything that I have actually
13 said to be harassment. And when I've asked you -- which
14 again, you just said that I harassed Kate, I have our
15 messages here. She was reTweeting things that you were
16 posting that was defamatory, and I said to her that I
17 blocked her because she was lying about me.

18 MR. BLAIR: Is this a question or is it testimony or
19 argument?

20 MS. SCARLETT: I'm just -- I'm trying to understand how
21 she's both saying that I harassed these other two women,
22 which there is no evidence that I have harassed them, and I
23 have evidence that I was not harassing either of them, and
24 what that has to do with Ms. Gjovik's harassment of me.

25 THE COURT: So what's the --

22 *March 1 2022 Transcript: Page 36*

1 MR. BLAIR: That sounds like an argument, Your Honor.

2 THE COURT: Just tell us the question.

3 Q. (By Ms. Scarlett) Why do you think -- why have you made
4 statements like that that I am stalking anybody who --
5 stalking you, coercing you, harassing you, intimidating you,
6 threatening you, and telling people that bad things will
7 happen to them if they support you?

8 Why were you saying that I was harassing, defaming,
9 swatting, threatening, illegally coercing you to modify
10 federal charges. Why we were saying -- it should be
11 mentioned that I am currently under investigation by
12 numerous federal agencies and law enforcement for federal
13 witness intimidation and obstruction of justice.

14 Why have you said that I'm in active communication with
15 Apple helping Apple in their campaign of harassment, threats
16 and horror against the safety whistle blower. Why did you
17 say I'll report you to Apple if I leak Apple's crimes? Why
18 did you say --

19 MR. BLAIR: Your Honor, can we have some help here? I
20 don't know what she's asking.

21 THE COURT: I just need a question, basically.

22 Q. (By Ms. Scarlett) Why do you -- why do you believe that
23 saying these things about me and posting this personal
24 information about me is for a lawful purpose?

25 THE WITNESS: Your Honor, I'd like to object to this

March 1 2022 Transcript: Page 37

38

1 question. She's trying to compel me to testify on my
2 federal charges.

3 THE COURT: Ma'am, you've got an attorney. He'll make
4 whatever objections are necessary.

5 MR. BLAIR: I'm going to object for my client, Your Honor.
6 At this point I don't see a question. What I hear is an
7 argument.

8 THE COURT: She asked a question.

9 MR. BLAIR: That's what I think --

10 THE COURT: She asked a question and it is -- she wants to
11 know how Ms. Gjovik thinks this serves a lawful purpose.

12 MR. BLAIR: What serves a lawful purpose?

13 THE COURT: Her posting the things that she's listed.

14 THE WITNESS: I'll answer --

15 MR. BLAIR: Ms. Gjovik, go ahead.

16 A. Yeah. These are part of my federal and state charges, which
17 have already met prima facie for subsequent harassment after
18 termination of my time at Apple.

19 I'm hesitant to testify to anything specific because it is
20 part of the ongoing investigation.

21 And I will say, I am single handedly representing myself
22 fighting the biggest company in the entire world with a long
23 history of horrible labor abuses and intimidation of anyone
24 challenging it. I'm terrified every single day since I
25 started reporting Apple to the government. I'm terrified

1 for my safety.

8 And rebuttal, Ms. Scarlett.

9 MS. SCARLETT: You know, you said that, you know, your
10 client has the right to post this information because of the
11 First Amendment. But in her testimony, she said that the
12 reason that she did so was because of something that I said
13 publicly that she believed to be a lie, and that was that I
14 said that her retaliatory discharge one is going to be tough
15 to prove because she leaked IP. She actually posted the
16 conversation that I had with her about that leaked IP.

17 And it's hard for me to hear her attorney now argue that
18 she has the right to free speech when she did not give me
19 that right myself.

20 That's it.

21 THE COURT: Okay. Thank you. So give me a minute here.

22 All right. So I've certainly heard the testimony, I've
23 reviewed the documents. Both parties have produced a number
24 of documents and a number of written statements, all of
25 those are incorporated in by this reference, including the

March 1 2022 Transcript: Page 44

22 And she told mutuals that because -- I had reached out to a
23 mutual friend at the time -- who is no longer a friend of
24 mine, who has actually provided written testimony in this --
25 that I was concerned because something that Ashley told her

March 1 2022 Transcript: Page 12-13

1 was not what Ashley had communicated to me multiple times,
2 and all I suggested was to protect herself, she reach out
3 and at least ask so that she could say that she did before
4 she published possibly defamatory information about a
5 company that was trying to harm all of us.

6 And after that, I came into this courtroom because it had
7 continued to escalate. Saying things that I was trying to
8 destroy her, that I was trying to have her swatted, and
9 that's calling emergency services that are armed in order
10 to -- in the hopes of having them physically harmed. I've
11 never done that. I would never do that. Coercing her.
12 Telling her to remove federal charges. Bullying her.
13 Saying that I'm under investigation by numerous federal
14 agencies and law enforcement.

15 So I wrote her an email after I came to court because
16 ultimately, again, I did not want any of this to harm her
17 career, to harm her, to do further harm to me. And I wrote
18 this email and I was like, look, here's all these
19 misconceptions that you've heard, here's the reality of
20 them. And I even apologized for the things that I said that
21 are nothing, you know, just that one comment that I made.

22 And she decided to escalate further instead. I said that
23 at that point I had no choice but to hire a process server
24 for this proceeding. And the way that she represented that
25 was that I -- a member of Apple's global security hired

March 1 2022 Transcript: Page 14

1 someone to track down and find her at her home and hand her
2 something physically. So, again, making these statements
3 that are -- not necessarily full on lies, but complete
4 misrepresentations that do nothing but to try to maliciously
5 frame that I have done something that I haven't done.

6 With the NLRB charge -- I'm not bringing up the charge
7 specifically. I'm talking specifically about Ashley --
8 excuse me, Ms. Gjovik, posting -- publishing these things on
9 a platform called Scribd, which actually removed it for
10 account abuse. A platform of her website. These are not
11 government websites that are hosting these, these are things
12 that Ashley -- that Ms. Gjovik is writing herself and
13 publishing herself that she is claiming are related to these
14 federal charges. But they're really just her, and that's
15 who is publishing this information. She's just doing it
16 under the guise that it is federally protected.

14 *March 1 2022 Transcript: Page 15*

15 9 On January 11th: "I recommend you send this document
16 10 retention notice and some sort of cease and desist missive
17 11 to them now."

18 *March 1 2022 Transcript: Page 17*

19 SEE EXHIBIT E

EXHIBIT C

EXHIBIT C: Petitioner's Contradicting Statements

Example 1: March 1 2022 hearing testimony by Petitioner, page 17:

14 She posted: "How are you claiming to run out of funds
15 when you can afford to support your daughter, but percocet,
16 a snowboard, your husband, and post all of that here. You
17 seem like you're lying with not being able to pay your
18 bills." Poor people can go snowboarding.

19 She posted about the fact that I'm unemployed, that I was
20 in the ER because I -- on December 20th, I overdosed
21 accidentally. That I had Covid. And again with the
22 percocet. All of this -- like, if even you get the 911
23 call, it's redacted by FOIA.

24 She has a post in here from somebody else that says: Cher
25 was soliciting money for her honeymoon fund, and that has my

Petitioner's own evidence showing the statement was made by someone other than Gjovik:

you. Thank you for your work.

214 of 281

QSea

Dec 20 2021-- Public Twitter.com & Medium Post ⁹⁶⁶

- Cher Scarlett (@cherthedev): When your ethics and personal morals diverge from a company's, or an industry's, you do something about it or you find a way to leave. Sometimes both. I don't punch down on laborers, but the idea you can't do anything else or that there is no ethical path forward is a lie. ⁹⁶⁷
 - o Cher Scarlett (@cherthedev): Even in the face of running out of funds to pay bills. I cannot. That doesn't make me superior, morally righteous or anything else but honest. I think what we are asking for is transparency from folks joining morally bankrupt companies who do evil things. You picked a side. ⁹⁶⁸
 - o Cher Scarlett (@cherthedev): When people say I self-sabotaged my Apple career, it's both true and not true. I started to see the divergence and did something about it. I couldn't do enough, and definitely couldn't continue with a hostile work environment, so I left. ⁹⁶⁹
 - o Goo (@StopItCOVID): How are you claiming to run out of funds when you can afford to support your daughter, but Percocet, a snowboard, your husband, and post all of that here? You seem like you're lying about "not being able to pay your bills." ⁹⁷⁰

Statement was evidence in Gjovik's legal brief about concerted retaliation against labor organizers and whistleblowers

**U.S. NLRB; U.S. DEPT OF LABOR; CALIFORNIA DEPT OF LABOR
ASHLEY GJOVIK V APPLE INC | PROPAGANDA CAMPAIGN V6**

are asking for is transparency from folks joining morally bankrupt companies who do evil things. You picked a side.¹⁰⁵²

- o **Cher Scarlett (@cherthedev)**: When people say I self-sabotaged my Apple career, it's both true and not true. I started to see the divergence and did something about it. I couldn't do enough, and definitely couldn't continue with a hostile work environment, so I left.¹⁰⁵³
- o **Goo (@StopItCOVID)**: How are you claiming to run out of funds when you can afford to support your daughter, but Percocet, a snowboard, your husband, and post all of that here? You seem like you're lying about "not being able to pay your bills."¹⁰⁵⁴

In legal memo, Gjovik noted account who made post was suspected to be Apple Inc

**U.S. NLRB; U.S. DEPT OF LABOR; CALIFORNIA DEPT OF LABOR
ASHLEY GJOVIK V APPLE INC | PROPAGANDA CAMPAIGN V6**

User	Platform(s)	Bot Scores	Stats	Details
Fred 257 ¹⁴⁷⁷	Apple Insider		<ul style="list-style-type: none"> Joined April 2019 139 Posts 	<ul style="list-style-type: none"> n/a
FirstnameBunchofnum bers ¹⁴⁷⁸	Twitter @FirstNa474 37596		<ul style="list-style-type: none"> Joined June 2021 0 Followers / 0 Following 	<ul style="list-style-type: none"> "I hate bullying"
Further Parthing ¹⁴⁷⁹	Twitter @one_more_t ime_2	Botometer 4.8/5	<ul style="list-style-type: none"> Joined Jan 2022 6 tweets 0 followers 	<ul style="list-style-type: none"> "When the paparazzi are your friends, it makes your enemies even sweeter"
FVMAzalea ¹⁴⁸⁰	Reddit		<ul style="list-style-type: none"> Joined: May 2020 	<ul style="list-style-type: none"> Bio: None Location: None
Gargarin04 ¹⁴⁸¹	MacRumors		<ul style="list-style-type: none"> 24 comments Joined Aug 2020 	<ul style="list-style-type: none"> Bio: None Location: None
Genovelle ¹⁴⁸²	Apple Insider Mac Rumors		<ul style="list-style-type: none"> Joined AI Aug 2008 Joined MR May 2008 1324 AI posts 1488 MR posts 	<ul style="list-style-type: none"> n/a
GoAwayThrowaway12 398 ¹⁴⁸³	Reddit		<ul style="list-style-type: none"> Joined: May 2020 	<ul style="list-style-type: none"> Bio: None Location: None
GoneCollarGone ¹⁴⁸⁴	Reddit		<ul style="list-style-type: none"> Joined July 2018 	<ul style="list-style-type: none"> Bio: None Location: None
Goo ¹⁴⁸⁵	Twitter		<ul style="list-style-type: none"> Joined Dec 2021 	<ul style="list-style-type: none"> Bio: none Location: None
Guybrush Threepwood ¹⁴⁸⁶	Twitter		<ul style="list-style-type: none"> Account Deleted 	<ul style="list-style-type: none"> n/a

¹⁴⁷⁷ Apple Insider, <https://forums.appleinsider.com/profile/comments/239039/Fred257>,

<https://web.archive.org/web/20220203002555/https://forums.appleinsider.com/profile/comments/239039/Fred257>

¹⁴⁷⁸ Twitter, <https://twitter.com/FirstNa47437596>, <https://web.archive.org/web/20220202012912/https://twitter.com/FirstNa47437596>

¹⁴⁷⁹ Twitter, https://twitter.com/one_more_time_2/with_replies,

https://web.archive.org/web/20220131063847/https://twitter.com/one_more_time_2/

¹⁴⁸⁰ Reddit, <https://www.reddit.com/user/FVMAzalea/>,

<https://web.archive.org/web/20220203002724/https://www.reddit.com/user/FVMAzalea/>

¹⁴⁸¹ MacRumors, <https://forums.macrumors.com/members/gargarin04.1227771/>

¹⁴⁸² Apple Insider, <https://forums.appleinsider.com/profile/51590/genovelle>; Mac Rumors

<https://forums.macrumors.com/members/genovelle.184469/>

¹⁴⁸³ Reddit, <https://www.reddit.com/user/GoAwayThrowaway12398/>,

<https://web.archive.org/web/20220203002748/https://www.reddit.com/user/GoAwayThrowaway12398/>

¹⁴⁸⁴ Reddit, <https://www.reddit.com/user/GoneCollarGone/>,

<https://web.archive.org/web/20220203002806/https://www.reddit.com/user/GoneCollarGone/>

¹⁴⁸⁵ Twitter, <https://twitter.com/StopItCOVID>;

<https://web.archive.org/web/20220130030112/https://twitter.com/StopItCOVID/status/1476831719231684609>

¹⁴⁸⁶ Twitter, <https://twitter.com/Guybrush55626232>

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2021

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Example 2: March 1 2022 hearing testimony by Petitioner, page 16:

16 This one -- in the document, it says: "Remove details
17 about Cher's husband, David Reimers being a convicted sex
18 offender. Which is something that was sealed and relieved
19 by the State because of the manifest injustice that was done
20 that we worked really hard to get taken off. It says --

Petitioner's evidence showing the statement with account name removed, implying Gjovik made the statement:

asking her to remove details about Cher's husband, David Reimers, being a convicted sex offender, who was further fined \$30k for failing to register as a sex offender. It's public info. Why should she remove it? ¹⁵⁰⁵

In legal memo, Gjovik noted account who made post was suspected to be Apple Inc

**U.S. NLRB; U.S. DEPT OF LABOR; CALIFORNIA DEPT OF LABOR
ASHLEY GJOVIK V APPLE INC | PROPAGANDA CAMPAIGN V6**

User	Platform(s)	Bot Scores	Stats	Details
Kpkimmel ¹⁵⁰⁵	Reddit		<ul style="list-style-type: none"> Joined Aug 2016 	<ul style="list-style-type: none"> Bio: None Location: None
LA Confidential ¹⁵⁰⁶	Twitter @LAConfidential1	Botomatic: 4.1/5	<ul style="list-style-type: none"> Joined Feb 32022 2 Tweets 2 Likes 	<ul style="list-style-type: none"> "HR Director"
LaKobe ¹⁵⁰⁷	Reddit		<ul style="list-style-type: none"> Account Suspended 	<ul style="list-style-type: none"> None
Lkrupp ¹⁵⁰⁸	Apple Insider		<ul style="list-style-type: none"> Joined Jan 2015 9,737 posts 	<ul style="list-style-type: none"> n/a

Statement was evidence in Gjovik's legal brief about concerted retaliation against labor organizers and whistleblowers

February 5 2022 – Public Twitter.com Posts

- **Cher Scarlett (cherthedev)**: This morning I wrote a heartfelt email to someone who has spent the last 2 months harassing me by any means necessary. I apologized where I felt was just, corrected misinformation, and begged for this person to remove personal information about me and my family and move forward.¹³⁰⁴
 - o **L.A. Confidential (@LAConfidential1)**: Translation: Cher wrote an email to Ashley Gjovik asking her to remove details about Cher's husband, David Reimers, being a convicted sex offender, who was further fined \$30k for failing to register as a sex offender. It's public info. Why should she remove it?¹³⁰⁵
 - **L.A. Confidential (@LAConfidential1)**: If Cher didn't falsely claim to be a single mom then there would be no reason to look into her husband. It's a matter of public record that he is convicted sex offender and was fined again for failing to register.¹³⁰⁶

EXHIBIT D

EXHIBIT D: Addendum To Legal Memo With Exhibits Of Animus; Excerpt On Petitioner

ASHLEY GJOVIK V APPLE INC

INTIMIDATION, THREATS, & OBSTRUCTION | FORBIDDEN ANIMUS PER NAMED PARTIES

- 4 Jan 2022: That's right it goes in the **square hole**. *[Video of bird placing objects in different shaped holes.]* (Ricky Mondello)³

Cher Scarlett (Apple Legal & Global Security)

Response to Gjovik's NLRB Filing

- 9 Sept 2021: Important! The **NLRB** investigates ALL charges brought to its office. **It isn't indicative of prosecution of cases or merit in charges.** I still strongly believe in the case myself and Apple employees have brought regarding unlawful statements and application of rules around pay (Cher Scarlett)⁴

Response to Gjovik's Retaliatory Termination

- 11 Sept 2021: It was still a violation and someone else mentioned one of **her tweets had proprietary information** in it. It's going to be **hard to prove this was retaliatory**. (Cher Scarlett)
- 26 Sept 2021: **She leaked IP** so the retaliatory discharge will be a tough one to prove. She also is now **saying she was suspended and that's not true**. (Cher Scarlett)⁵
- 29 Oct 2021 I honestly feel sorry for the people **who fall for the gifts**. (Cher Scarlett)⁶
- 29 Dec 2021: Someone else got a **Cease & Desist** for printing something [Gjovik] said that wasn't true from Apple. (Cher Scarlett)⁷
- 20 Dec 2021: I suggested another victim get comment from Apple or proof about something she wrote that to my knowledge, from speaking with the person it was about, to protect herself. **She did leak IP, and posted the evidence of it, which is now cited in Apple's defense**. (Cher Scarlett)⁸
- 20 Dec 2021: I quietly warned a handful of people about her behavior towards other people. **I refused to corroborate misrepresentations of fact, and provided contrary evidence**. (Cher Scarlett)⁹

Response to Gjovik's EEOC/DFEH Charge & "Right to Sue"

- 13 Sept 2021: **The EEOC and DFEH have already declined to pursue** and given her the right-to-sue (Cher Scarlett)
- 1 Nov 2021: "If we aren't able to determine if the law may have been violated, we will send you a Notice of Right to Sue." **It DOES NOT mean the evidence justifies a verdict would be in the complainant's favor. When it does, they FIRST attempt to settle.** [EEOC link]. (Cher Scarlett)¹⁰

³ Twitter, <https://twitter.com/rmondello/status/1479128619675013120>, <https://web.archive.org/web/20220129181249/https://twitter.com/rmondello/status/1479128619675013120>

⁴ Twitter, <https://twitter.com/cherthedev/status/1436194928351014942>:

⁵ Team Blind, See PDF

⁶ Twitter, <https://twitter.com/cherthedev/status/1454319910427918344>.

⁷ Text messages, see screenshots

⁸ Twitter, <https://twitter.com/cherthedev/status/1476684139826802689>.

⁹ Twitter, <https://twitter.com/cherthedev/status/1476685163660603403>.

¹⁰ Twitter, <https://twitter.com/cherthedev/status/1455195681258237957>.

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2021

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ASHLEY GJOVIK V APPLE INC

INTIMIDATION, THREATS, & OBSTRUCTION | FORBIDDEN ANIMUS PER NAMED PARTIES

- 3 Jan 2022: Both the DFEH and EEOC issued Gjovik right to sue letters, which indicates that while the agencies were unable to determine if law was violated and would not be proceeding on her behalf. (Cher Scarlett via Gjovik's Wikipedia Page) ¹¹

Admission to Blacklisting

- 12 Oct 2021: Proud of you. There's really no point in it. Good News outlets don't take her seriously because her story shifts like a chameleon, and eventually, it will all work itself out. (Cher Scarlett) ¹²
- 11 Dec 2021: I made the right choice in exercising the boundary of ejecting them from amplification. (Cher Scarlett) ¹³
- 5 Feb 2022: Multiple people reported this person for their behavior to their University as far as I know. (Cher Scarlett) ¹⁴

Response to Gjovik Reporting Unlawful Conduct to the Gov

- 25 Oct 2021: Anyone can file complaints with federal and state agencies. It doesn't mean there is merit, and it doesn't mean the person doing the reporting is being honest or genuine in doing so. Hero culture creates parasocial relationships that create scary influence that spreads. (Cher Scarlett) ¹⁵
- 25 Oct 2021: This is important and nuanced. Whistleblowers are human. Everyone has their own agenda, and if you do not temper your expectations and question motives and information — you can easily get caught up in supporting something completely bogus or worse... something harmful. (Cher Scarlett) ¹⁶
- 29 Oct 2021: So far, she has tried desperately to use other victims for her own gain, made racist remarks, lied to the public, to the government, about what happened to her, and about me, and a bunch of other people who tried to help her. I cannot stand to watch good people such as yourself get wrapped up in her web. (Cher Scarlett)
- 13 Dec 2021: "Lions don't concern themselves with the opinions of sheep." I used to think this quote was egotistical, but now, I get it. I see people misunderstand what they read, and believe full-out fabricated nonsense that borders conspiracy, day-in and day-out. There's no reaching them. (Cher Scarlett) ¹⁷
- 29 Dec 2021: I want to see her get justice, but perjuring herself and doing all of this is harmful (Cher Scarlett) ¹⁸
- 30 Dec 2021: I am not going to diagnose anyone, but this behavior maps to narcissistic personality disorder, and if it's narcissistic supply driving them, giving it ANY attention only FUELS it

¹¹ Wikipedia, https://en.wikipedia.org/wiki/Wikipedia:Conflict_of_interest/Noticeboard/Archive_184

¹² Twitter, <https://twitter.com/cherthedev/status/1447927265166249997>,

<https://web.archive.org/web/20220131033740/https://twitter.com/cherthedev/status/1447927265166249997>

¹³ Twitter, <https://twitter.com/cherthedev/status/1469706762831814657>,

<https://web.archive.org/web/20220129183819/https://twitter.com/cherthedev/status/1469706762831814657>

¹⁴ Twitter, <https://twitter.com/cherthedev/status/1490053004791218177>,

¹⁵ Twitter, <https://twitter.com/cherthedev/status/1452677821998850048>,

¹⁶ Twitter, <https://twitter.com/cherthedev/status/1452677378925219845>,

¹⁷ Twitter, <https://twitter.com/cherthedev/status/1470572468662267904>,

¹⁸ Text messages, see screenshots

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202

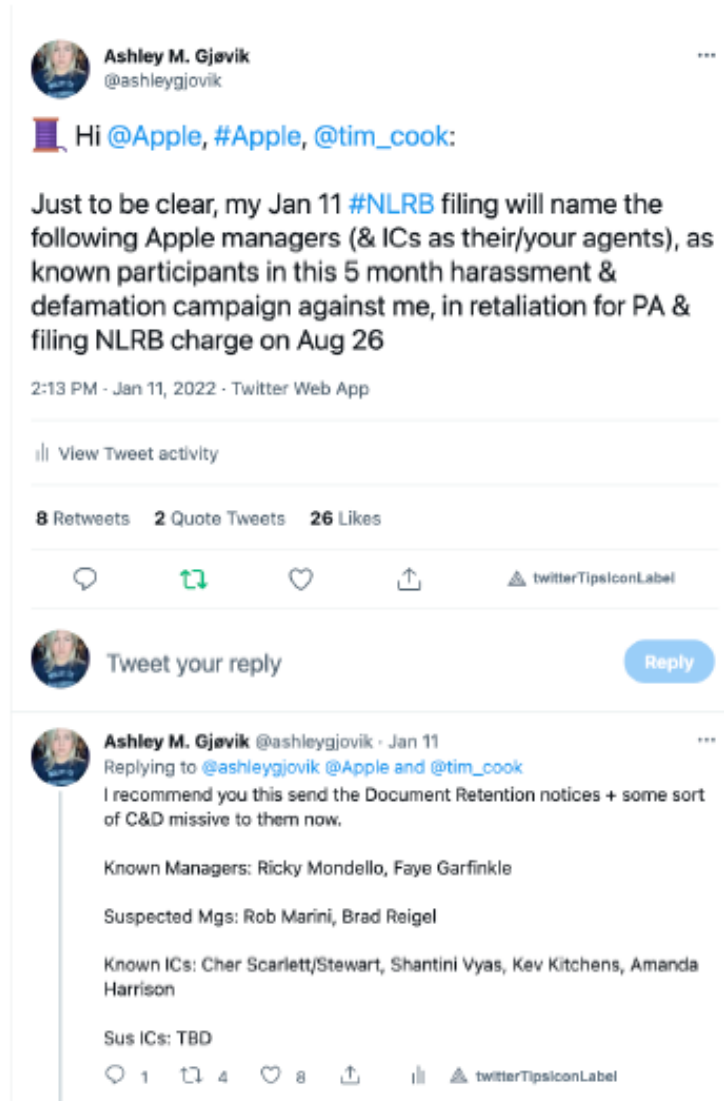
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EXHIBIT E

EXHIBIT E: Twitter Posts Petitioner Testified about but did not Provide Evidence of

ASHLEY GJOVIK V APPLE INC
INTIMIDATION, THREATS, & OBSTRUCTION - PROTECTED FEDERAL ACTIVITY v3



Twitter: 11 Jan 2022, <https://twitter.com/ashleygjovik/status/1481026531438706689>

ASHLEY M. GJOVIK
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Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2022
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ASHLEY GJOVIK V APPLE INC
INTIMIDATION, THREATS, & OBSTRUCTION - PROTECTED FEDERAL ACTIVITY v3



Ashley M. Gjovik
 @ashleygjovik

...

✓ My January 10th, 2022 #NLRB charge against @Apple alleging their managers & agents have organized a targeted online harassment campaign against me, in retaliation for Protected Concerted Activity & for filing an NLRB charge on Aug 26th, 2021.
nrlrb.gov/case/32-CA-288...



Apple, Inc.

Follow

Case Number: 32-CA-288816

Location: Cupertino, CA

Date Filed: 01/10/2022

Region Assigned: Region 32, Oakland, California

Status: Open

Docket Activity

Items per page 10 ▼

Date	Document	Issued/Filed By
01/12/2022	Initial Letter to Charging Party*	NLRB - GC
01/12/2022	Initial Letter to Charged Party*	NLRB - GC
01/10/2022	Signed Charge Against Employer*	Charging Party

The Docket Activity list does not reflect all actions in this case.

ALT document may require redactions before it can be viewed. To obtain a copy, please file a request through our FOIA branch.

2:49 PM · Jan 13, 2022 · Twitter Web App

Twitter: 13 Jan 2022, <https://twitter.com/ashleygjovik/status/1481760216978837505>

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ASHLEY M. GJOVIK
Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2022

Replying to @DrakenBlkKn

This is beyond administrative & civil.

This is criminal. 🚔 ⚖️

Twitter: 31 Jan 2022, <https://twitter.com/ashlevjovik/status/1488305820496322560>

ASHLEY GJOVIK V APPLE INC
INTIMIDATION, THREATS, & OBSTRUCTION - PROTECTED FEDERAL ACTIVITY v3



Twitter: 3 Feb 2022, <https://twitter.com/ashleygjovik/status/1489349473968930817>



Twitter: 3 Feb 2022, <https://twitter.com/ashleygjovik/status/1489423801733369867>

ASHLEY M. GJOVIK
Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2022
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EXHIBIT F

EXHIBIT F: Petitioner's Cat "Evidence"



Ashley M. Gjovik
@ashleygjovik

Here's another interesting one.

Cher posted a lot about "growing up poor," like "trap house" poor, she says.

Maybe?

But, also, her mom's over here with tassels on her ottoman & looking like a fucking late 80s/early 90s goddess.



Cher Scarlett
@cherthedevo

times it's weird to be in a different world than the one you grew up in. It can be 30 years before you find something you thought was normal is a "poor people house" thing.

1M · Sep 26, 2021 · Twitter for iPhone

Cher Scarlett
@cherthedevo

Let me tell you a story.

I grew up poor. Not, oh, we have linoleum poor. Poor like the pink slip is the electricity is off again. The note on the door means we're moving again. There are ants coming in through the walls of the one bedroom apartment that is falling apart.

8:20 PM · Jul 27th 2019 · Twitter Web App



1:48 PM · Jan 9, 2022 · Twitter Web App

3 Likes

E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

Cont.



NOTE: GJOVIK ATTEMPTED TO REDACT NAMES

E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

EXHIBIT G

EXHIBIT G: Excerpts of Petitioner's e-Filed "Evidence" for the 2/15/2022 and 3/1/2022 Hearings

Help Center

Requests

FILED
FEB 15 2022
KDCD-East Division
Redmond Courthouse
22CIV01704KCX

► Report copyright infringements and abuse
2022-02-06 10:32:09 Solved

Ticket details

FILED
FEB 15 2022
KDCD-East Division
Redmond Courthouse

Cher Scarlett
2 days ago

THIS IS AN OFFICIAL NOTIFICATION THAT A USER OF SCRIBD OR SLIDESHARE (choose one): *

Please list the URL(s) on Scribd or SlideShare where the material is found: *

Describe, in as much detail as possible, the nature of the personal information and the exact page(s) where it is located. *

has posted my personal information to Scribd or SlideShare.

<https://www.scribd.com/document/555822358/Ashley-Gjovik-v-Apple-Inc-Propaganda-Campaign-Final-v4>

My name is mentioned in this document nearly 400 times ("Cher Scarlett"), and the majority of it is republication of my tweets (which I own, per Twitter's content publication rules), and republication of my Medium posts (which I own, per Medium's content publication rules).

Most all of the content includes personal information about me, including linking to an old wedding registry containing more former legal name and the name of my husband, my medical diagnoses and other medical and or otherwise private, personal information that would be redacted via FOIA per HIPAA, my former legal name, which I changed for a safety reason and was found just by King County courts in Washington State to not have to be published together because it would pose a threat to my person. Much of the content is also containing republications of my family members' social media accounts, which she found by cyberstalking, and publishing their names. I am a public figure in the space we are working in, and my family members have now faced harassment because she has connected them to me publicly and pointed to their social media accounts without my or their consent.

I am seeking an anti-harassment order against her to stop her from posting such content, but it would be

E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

EMR. MOTION FOR. INJ,
CASE NO. 2:22-CV-00807-RAJ-BAT

PO BOX 119 SANTA CLARA, CA 95050
(408) 883-4428

helpful if your company would take it down before it continues to do further harm to me and my family.

Was this content published by a state, local, or Federal government or court of law in the United States? *

Email address: * me@cher.dev



Delaney
1 day ago

Thank you for contacting Scribd. This content was removed. It may take several days for Google and other search engines to remove deleted links from their indexes.

Best regards,

Delaney

Copyright, Abuse, & Privacy Specialist

Scribd, Inc.

Questions? <https://support.scribd.com/hc>

Cher Scarlett

1 day ago

She has re-uploaded the document.

https://twitter.com/ashleygjovik/status/1490816438667341824?cxt=HHwWgMCjwd_puLApAAAA

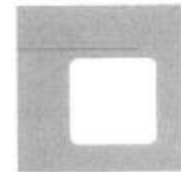
<https://www.scribd.com/document/557503681/Gjovik-v-Apple-Intimidation-Campaign-Evidence-Report>

Thank you for your urgency,

Cher

Cher Scarlett

7 hours ago



E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

Petitioner submitted this in evidence on Feb 15 2021 for hearing against Gjovik:



E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

Petitioner submitted this in evidence on Feb 15 2021 for hearing against Gjovik:



Ashley M. Gjovik
@ashleygjovik

...

The faceless & faced trolls weren't happy

I get 3k word email frm 🍏 Cher saying she reported me to the FBI; she'll inform Apple if I speak publicly abt 🍏 threatening me; & demanded I remove info & allegations abt her from my fed charges

I said NO & she sayz she's suing me now



Ashley M. Gjovik @ashleygjovik · Jan 9

...

The only thing I asked of this **witch** is stop lying about me & threatening people they'll get hurt if they support me

Listen I'm all about 1st amendment. Tell people not to support me cause, idk, you don't like my elbows

But don't lie & don't do it under a banner of labor rights



1



5



E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

Petitioner submitted this in evidence on Feb 15 2021 for hearing against Gjovik:



Ashley M. Gjovik
@ashleygjovik

...

Replying to @ashleygjovik @WarriorWomen4Y and 3 others

**On Dec 31 2021 I req Scarlett cease & desist all
contact with me, defamation of me, & stop harassing
my friends or I will request a restraining order**

**Since that warning she tried to SWAT me, got me
banned from Wikipedia, & sent me threatening emails**

Plz do not encourage contact

6:45 PM · Feb 12, 2022 · Twitter Web App

E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,
King County District Court, case no. 22CIV01704KCX (1 March2022).

Petitioner submitted this in evidence on Feb 15 2021 for hearing against Gjovik:

← Thread



Ashley M. Gjovik
@ashleygjovik

...

I guess it makes sense now that these months of targeted harassment & defamation against me that seemed to try to get me to give up/kill myself, are starting to appear orchestrated by an Apple coworker who used to openly brag about trying to destroy me to the point of suicide.

3:50 PM · Jan 11, 2022 · Twitter Web App

1 Quote Tweet 15 Likes



Tweet your reply

Reply



Ashley M. Gjovik @ashleygjovik · Jan 11

...

Replying to @ashleygjovik

Everyone kept asking, why on earth is Cher Scarlett doing this to you? What motive does she have to do such awful things?

Best guess was: she works in Apple Legal/Security; she's already getting a payout from Apple

But, THIS, this connects all the dots. It all makes sense now.

3



13



^ In Petitioner's Feb 5 2022 email to Gjovik, which Petitioner submitted as her own evidence, she told Gjovik that Petitioner reported Gjovik to "Apple" for posting this & 1 other post

E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

EXHIBIT H

EXHIBIT H: Excerpt of The Legal Analysis Memo Gjovik Submitted to the US Gov along with the Exhibit/Evidence Memo (Complaint Exhibit D)

ASHLEY GJOVIK V APPLE INC
INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO

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DATED FOR FINAL SUBMISSION: FEBRUARY 7 2022 (1wk before served)

ASHLEY GJOVIK V APPLE INC
INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO

Summary

Under information & belief, Apple Inc. (via their managers, employees, & agents), have been orchestrating an extensive propaganda & harassment campaign against Gjovik since August 2021. Under this campaign, Apple Inc has made frequent, damaging false accusations about Gjovik's actions and statements, her motives and character, and her mental health. Apple Inc has also made numerous threats against her related to retaliation, termination, litigation, blacklisting, and violence.

The campaign started while she was still an Apple employee & has been waged by Apple managers under their name & Apple position (*i.e. Ricky Mondello, Faye Garfinkle, Eric Vitiello, DJ Capelis, Bryan Bartow, & others*) as well as current and ex-Apple employees (*Char Scarlett, Shantini Fyaz, Amanda Harrison, Kev Kitchens, Steven McGrath, Brian Ganninger, Ankit Aggarwal & others*), again, under their own names & positions at Apple. There also appears to be a large online presence assumably contracted by Apple Global Security which appears to have access to much of her private &/or personal information, and repeats, ad nauseum, specific talking points assumably selected by Apple Inc for this campaign.

This campaign is believed to be being waged in retaliation for Gjovik's protected activity starting in March 2021, and also in retaliation for her reporting Apple Inc's unlawful conduct to the government and law enforcement in the summer of 2021, and continuing to participate in the government investigations. This campaign is believed to be being waged in an effort to chill organizing & unionization efforts at Apple Inc, intimidate witnesses from testifying to what Apple Inc did to Gjovik, coerce Gjovik to withdraw her complaints, and to generally intimidate current Apple Inc employees from speaking out or reporting unlawful activity.

This campaign began shortly after Gjovik started talking to the press and the government about her safety, labor, and discrimination concerns but quickly amplified once she filed formal complaints against Apple Inc with the NLRB, EEOC, U.S. Department of Labor, California Department of Labor, U.S. SEC, U.S. FBI, and other regulatory & law enforcement agencies. Within days of her reports, the frequency and intensity of the abuse dramatically increased, including threats of termination & other retaliation, threats of violence, threats of litigation, threats of bankruptcy, threats against her friends and supporters, and much coercion to drop her government complaints & to not file a lawsuit.

ASHLEY M. GJOVIK
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 Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2021

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1 DATED FOR FINAL SUBMISSION: FEBRUARY 7 2022 (1wk before served)

2
3 **ASHLEY GJOVIK V APPLE INC**
4 **INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO**

5 **Gjovik is a Federal Witness, Informant, and Victim**

6 Starting in March 2021, Ashley Gjovik has engaged in a multitude of activity protected by federal
7 law (amongst protections from state law as well). Gjovik has informed federal government agencies and
8 law enforcement of potential unlawful activity. Gjovik has provided testimony to a federal agency as a
9 witness, she has provided evidence to numerous federal agencies of alleged unlawful conduct, and she
10 has been a victim of violations of federal whistleblower laws.

11 First, Ms. Gjovik reported concerns about employee safety and possible violations of CERCLA
12 & OSHA internally in March and April, to her management, human resources, employee relations, and
13 the environmental health & safety team. Gjovik quickly faced retaliation and hostility from her manager,
14 quickly followed by retaliation and animus from employee relations, related to her safety concerns and
15 complaints. Gjovik contacted the U.S. EPA Superfund team to ask questions and express concerns, and
16 then began reporting concerns about internal activities to the U.S. EPA for assistance and guidance, and
17 finally requesting intervention by the U.S. EPA on the site due to suspected CERCLA and SOX
18 violations. Gjovik began posting on Apple's "Slack" discussion tool about her concerns about Apple's
19 offices on Superfund sites and talking with the press about her concerns about her office in July 2021.

20 Gjovik also raised concerns about violations of the Sarbanes-Oxley (SOX) Act in July 2021,
21 leading to her making a formal internal complaint about a conflict of interest within Apple's Board of
22 Directors on August 23 2021 and then filing a Whistleblower tip with the U.S. SEC on September 1st,
23 2021, in addition to the concerns she raised to the U.S. EPA in July, a disclosure Apple was made aware
24 of.

In July 2021, Gjovik raised concerns about an Apple employee apparently smuggling Apple Inc
products into Syria and also running a technology business that operates in Syria and facilitates border
crossing between Syria & Lebanon. Gjovik had raised concerns to her leadership and the human
resources team about potential illegality of the employee's actions under U.S. & international sanctions
against Syria ten months prior with no response. On July 20 2021, Gjovik escalated the issue to Apple's
Business Conduct Global Compliance team who expressed their own concerns. Gjovik informed her
leadership she escalated the issue to Business Conduct & then was further retaliated upon by her

25 **ASHLEY M. GJOVIK**

26 Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University
27 Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2021

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ASHLEY GJOVIK V APPLE INC

INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO

leadership for this escalation. Gjovik would then file a complaint to the U.S. FBI in on September 3 2021 about the potential illegality and also the retaliation for raising the concerns.

After Gjovik was suspended in August, she filed charges with the U.S. NLRB, U.S. EEOC, U.S. SEC, U.S. DOJ, and other agencies, capturing the diverse cornucopia Apple's unlawful conduct towards her & her colleagues. Gjovik began providing evidence and witness statements to these federal agencies in late August and early September.

Gjovik was terminated the day she signed off on her statement to the U.S. EEOC and the day before her U.S. NLRB affidavit was to be taken. When Gjovik was unexpectedly contacted by a certified interrogator on Apple's "Workplace Violence" team, insisting she get on the phone with him "within the hour," Gjovik agreed to engage but requested the communication be in writing because, as she wrote Apple, it felt like "witness intimidation the day before her NLRB affidavit." Gjovik also informed Apple that she notified the NLRB of their communications from the "Workplace Violence" team. Gjovik was terminated within hours.

See: Evidence Report & Evidence of Protected Activities

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2021

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Federal: Witness, Victim, Informant

Cases/Investigations:

- U.S. NLRB [32-CA-282142](#), [32-CA-283161](#), [32-CA-284428](#), [32-CA-284441](#); & [CA-288816](#)
- U.S. Department of Labor: *Ashley Gjovik v Apple Inc.*, Apple Inc/Gjovik/9-3290-22-051: CERCLA, SOX, & OSHA whistleblower retaliation.
- U.S. EEOC: *Ashley Gjovik v Apple Inc.*, (556-2021-00608)

Charges/Complaints/Tips

- U.S. SEC Whistleblower Tip: Sept 1, 2021 (#16304-612-987-465); Oct 27, 2021 (#16353-506-600-213)
- U.S. DOJ FBI Complaint: Sept 3 2021; 5 February 2022
- U.S. DOJ Antitrust Tip: Nov 16, 2021 (confirmed by DOJ on Dec 14, 2021)
- U.S. DOJ NCDF Complaint: Sept 3, 2021 10:27pm PST
- U.S. DOJ Civil Rights Complaint: Sept 2, 2021 (#98145-RJH)
- U.S. DOJ FCPA Complaint: Jan 21, 2021 (confirmed by DOJ on Jan 21, 2021)
- U.S. EPA Complaint: April-Aug 2021; August 29, 2021

California: Witness, Victim, Informant

- California Department of Labor: *Ashley Gjovik v. Apple Inc.*, (RCI-CM-842830)
- California EPA Complaint: Aug 30, 2021 (COMP-51794)
- Civil Lawsuit: drafting complaint

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EXHIBIT I

EXHIBIT I: Petitioners May 24 2022 Posts

6/21/22, 3:38 PM

(337) All mail | ashleymgjovik@protonmail.com | Proton Mail

Please add post as additional evidence confirming witness tampering, intimidation, & retaliation

From: Ashley Gjovik <ashleymgjovik@protonmail.com>

To: Sollett, Mathew <Mathew.Sollett@nrlb.gov>

Date: Tuesday, May 24th, 2022 at 6:11 PM

Hello,

Please add this as additional evidence confirming witness tampering, intimidation, & retaliation.

She is responding to this, which I sent NLRB OIG & Asst GC yesterday, <https://ashleymgjovik.substack.com/p/field-notes-on-regulatory-capware?r=7w>

Please, please, ask again if we can get formal DOJ involvement for what she's doing as federal crimes -- or some other type of help.

The stress of all this is making me physical ill.

Thread

Cher Scarlett @cherthedev · 8h

Shout out to @NLRB for their studious care with my charges, those that overlap them, and those that are frivolous this past year.

To the investigator out of Region 32 whose character is being attacked: Thank you for diligently helping me understand how to hold @Apple accountable

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Cher Scarlett
@cherthedev

From reading my novels unsure of which behavior is or could be illegal, to ensuring they could not get away with unlawful settlements, supplemental affidavits, getting witness testimony, and explaining how we may dismantle the Boeing decision and protect workers: THANK YOU.

11:24 AM · May 24, 2022 · Twitter Web App

Cher Scarlett @cherthedev

Shout out to @NLRB for their studious care with my charges, those that overlap them, and those that are frivolous this past year. To the investigator out of Region 32 whose character is being attacked: Thank you for diligently helping me understand how to hold @Apple accountable

https://mail.proton.me/u/0/all-mail/V8tMRy5MgRdKy-2C98DPkmYMPv4x9ty88u7W189NP8TJ_NpBuvv03HC-xYFMo0Dka05HnzUdMSbDmY2jw... 1/2